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June 28, 2024

**Via ECF**

The Honorable Nelson S. Román  
The Hon. Charles L. Brieant Jr. United States Courthouse  
300 Quarropas Street, Courtroom 218  
White Plains, NY 10601  
Fax: (914) 390-4179

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**Re: Addi v. The International Business Machines, Inc., Case No. 7:23-cv-05203**

Dear Judge Román:

I represent Plaintiff Lisa Addi in the above matter. Pursuant to Rule 1.E of the Court's Individual Rules, I write jointly on behalf of Plaintiff and Defendant The International Business Machines, Inc. to request a stay of all deadlines in this matter pending the Second Circuit's decision in *Salazar v. National Basketball Ass'n*, No. 23-1147 (2d Cir.).

Good cause exists to grant this stay. On May 31, 2024, the Court issued an Order (i) granting Defendant's Motion to Dismiss the First Amended Complaint with prejudice as to Plaintiff's MWESA claim; (ii) granting Defendant's Motion without prejudice as to Plaintiff's unjust enrichment claim; and (iii) deferring resolution of Defendant's Motion as to Plaintiff's VPPA claim until the resolution of *Salazar*. ECF No. 36. The same Order provided that if Plaintiff sought to amend her unjust enrichment claim, she would have until July 1, 2024 to do so, with Defendant's response due July 22, 2024. *Id.* Rather than having this action proceed piecemeal, the Parties believe that judicial resources will be conserved by staying the entire action until the Second Circuit's decision in *Salazar*, which will better inform the Parties and the Court of the propriety of an amendment and allow all claims to proceed simultaneously.

The Parties further request that the Court set the following deadlines following the resolution of *Salazar*:

Event	Current Deadline	Proposed Deadline
Status Report Informing the Court of the Second Circuit's Decision in <i>Salazar</i>	N/A	Seven (7) days after the Second Circuit's Decision in <i>Salazar</i>
Second Amended Complaint	July 1, 2024	Twenty-one (21) days after the Second Circuit's Decision in <i>Salazar</i>
Response to the Second Amended Complaint	July 22, 2024	Thirty (30) days after Plaintiff files the Second Amended Complaint

MEMO ENDORSED

Defendant previously requested an extension of time to file its response to the original Complaint, which the Court granted (ECF No. 11). The Parties jointly requested an extension of time to file the First Amended Complaint and respond thereto, which the Court granted (ECF No. 17). The Parties jointly requested an extension of the briefing schedule for Defendant's Motion to Dismiss the First Amended Complaint, which the Court granted (ECF No. 24).

Respectfully submitted,



Max S. Roberts

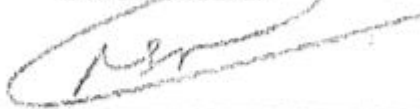
*Attorneys for Plaintiff*

CC: All Counsel of Record (via ECF)

**The Court GRANTS the parties' joint request and STAYS this proceeding for six months, until January 2, 2025. On or before January 2, 2025, the parties are directed to inform the Court of the status of *Salazar v. National Basketball Ass'n*, No. 23-1147 (2d Cir.). The Clerk of Court is kindly directed to terminate the motion at ECF No. 37.**

**Dated: July 1, 2024  
White Plains, NY**

SO ORDERED:



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NELSON S. ROMÁN  
United States District Judge